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*NOT ADMITTED TO THE NEW YORK BAR

January 21, 2021

By ECF

The Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Kaloma Cardwell v. Davis Polk & Wardwell LLP, et al.
No. 1:19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent defendants in the above-captioned matter.

Pursuant to Section 1.E. of Your Honor's Individual Rules of Practice in Civil Cases, defendants respectfully request that the Court extend the current deadline (for both parties) to serve requests to admit from January 25, 2021 to the last day of fact discovery, February 25, 2021. ECF 66.¹ Defendants make this request in light of plaintiff's anticipated production of materials on February 4, 2021, further to defendants' motion to compel.

¹ The Civil Case Management Plan and Scheduling Order (ECF 27, as modified by ECF 66), provides that "contention interrogatories . . . must be served no later than thirty (30) days before the close of **discovery**." The

This is defendants' first request for an extension of time with respect to these deadlines. This extension would not affect any other scheduled dates.

Plaintiff consents to this request.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Susanna Buergerl

Susanna Buergerl

cc: Counsel of Record (*Via ECF*)